

1 THE HONORABLE RICHARD A. JONES
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 BLACK LIVES MATTER SEATTLE-
11 KING COUNTY, ABIE EKENEZAR,
12 SHARON SAKAMOTO, MURACO
13 KYASHNA-TOCHA, ALEXANDER
14 WOLDEAB, NATHALIE GRAHAM,
15 AND ALEXANDRA CHEN,

16 Plaintiffs,

v.

CITY OF SEATTLE,

Defendant.

No. 2:20-cv-00887-RAJ

DECLARATION OF KATHERINE
CONROY IN SUPPORT OF PLAINTIFFS'
MOTION FOR CONTEMPT

17 I, Katherine Conroy, declare and state as follows:

18 1. The information contained in this declaration is true and correct to the best of my
19 knowledge, and I am of majority age and competent to testify about the matters set forth herein.

20 2. I'm a student in clinical psychology in a PhD program at the University of
21 Washington, focusing on substance use and substance use treatment.

22 3. As a student of mental health, I have seen how our criminal legal system regularly
23 harms people with mental illness—especially people of color—instead of caring for them. I have
24 been protesting racism and oppression in the criminal legal system and standing up for Black
25 lives since June.

26 CONROY DECL. (No. 2:20-cv-00887-RAJ)

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1 4. I participated in the march on Saturday, July 25, 2020 until I was injured by a
 2 police explosive of some sort and had to go home.

3 5. In the afternoon, a group of seven friends and I gathered with other protesters near
 4 Seattle Central before the march began. We participated in group education, listening to
 5 speakers.

6 6. When the march began, my friends and I were in roughly the middle of the crowd.
 7 As we marched, we chanted, focusing mostly on the demands for police reform articulated by
 8 King County Equity Now, a coalition of Black-led, community-based organizations.

9 7. **The march was peaceful.** I did not see any protesters throw anything at the
 10 police or do anything else to provoke a violent police response.

11 8. When we rounded the corner of Pine near the East Precinct, I saw police officers
 12 moving quickly down the hill on Pine towards us. Some protesters began to run away from the
 13 rapidly approaching police force.

14 9. **With no warning, police started firing a massive number of chemical
 15 weapons and projectiles at us. The amount of force they unleashed on us out of the blue
 16 was overwhelming.**

17 10. At the time, my friend Jessica Bonafilia and I had our arms linked. We got hit
 18 with some kind of explosive that seems to have contained pepper spray.

19 11. I felt pain in my left leg, but I could not see anything on my leg through my jeans.
 20 I looked around and saw other protesters with holes ripped in their clothing and blood seeping
 21 through.

22 12. A canister dispersed a thick cloud of a chemical into the air that made us cough,
 23 made it hard to breathe, and made my eyes sting.

24 13. I stepped off the march route into Cal Anderson park as police were pushing the
 25 protesters down Pine to try to wash out my eyes and regroup with my friends.

26 14. Eventually I joined up with the other protesters again a block back on Pine.

1 **15. Throughout the march, police were firing projectiles and explosives
2 indiscriminately into the crowd with no warning or clear objective. Of my group of 8
3 friends, half of us got injured by police weapons.**

4 **16. None of us was violent, or posed any threat. We were there to protest, to
5 assemble, to exercise our rights. We were there to demonstrate against police violence. And
6 we were met with police violence.**

7 **17. Eventually, after a break in the onslaught of force from the police, our group
8 rounded the corner of Pine and Broadway.**

9 **18. At this point, there were a few lines of protesters between me and the police.
10 Police started to push us back again aggressively, but we could not move back fast enough
11 because some people behind us were not moving, or not moving quickly enough. Some
12 people tripped over traffic cones or other people who had fallen. I was extremely terrified,
13 and believed that I was going to be caught in a stampede caused by the sudden police
14 encroachment.**

15 **19. Although I had linked arms with my friends so we would not get separated, in the
16 pushing and pulling of the crowd caused by the police, I began to lose my friends, so stepped out
17 of the crowd when I saw an opportunity to do so without interacting with police.**

18 **20. I was scared to stay at the protest without my friends, so I returned to my vehicle
19 to go home. In the car, my sweat mixed with the pepper spray that was still on my skin making
20 my eyes sting. It was very hard to see well enough to drive and made me very anxious I would
21 not be able to get home safely.**

22 **21. When I got home and undressed, I saw that the projectile that hit me had left a
23 large welt on my thigh and a chemical burn through the first layer of my skin. Eventually the
24 welt turned dark purple and spread across about six inches of my leg.**

25 **22. Attached as Exhibit A is a true and correct copy of a photo of my leg, taken the
26 night of July 25, 2020. Attached as Exhibits B-C are true and correct copies of photos of my leg,**

taken the night of July 25, 2020 after I took a shower. Attached as Exhibits D-G are true and correct copies of photos of my leg, taken on July 26, 2020. Attached as Exhibit H is a true and correct copy of a photo of my leg, taken on July 27, 2020.

23. One week later, my injury is healing, but is still visible and painful. Attached as Exhibit I is a true and correct copy of a photo of my leg, taken on July 30, 2020. Attached as Exhibit J is a true and correct copy of a photo of my leg, taken on August 1, 2020.

Executed this 2nd day of August 2020 at SEATTLE, WASHINGTON.

I declare under penalty of perjury under the laws of the United States and the State of Washington that the foregoing is true and correct.

By

Katherine Conroy

KATHERINE CONROY

EXHIBIT A



EXHIBIT B



EXHIBIT C



EXHIBIT D



EXHIBIT E



EXHIBIT F



EXHIBIT G



EXHIBIT H



EXHIBIT I



EXHIBIT J

